

REMARKS

In the Office Action, claim 1 is rejected under 35 U.S.C. § 103 as allegedly unpatentable over U.S. Patent No. 6,621,921 ("Matsugu"). Applicants believe that this rejection is improper based on at least the reasons set forth below.

Claim 1 recites a camera calibration device for calibrating a stereo system which includes a base camera and a detection camera. The device includes an image holding device for holding images obtained by shooting a plane, where a known pattern is drawn, with the base camera and the detection camera at at least three view points free from any spatial positional restriction; and a parameter calculating device for calculating parameters necessary for distance measurement in the stereo system based on the images held by the image holding part.

Applicants believe that Matsugu is distinguishable from claim 1. For example, the at least three view points as claimed are for obtaining images to calculate parameters in the stereo system. Contrary to the Patent Office's position, the "arbitrary view point" described in Matsugu is a view point of a three-dimensional image to be produced by using parameters. In Matsugu, an image processing method is provided that produces a three-dimensional image of an object sensed from an arbitrary view point. The object is sensed with a predetermined image pattern whose shape and position are known from a number of view point positions. See, Matsugu, for example, claim 1. Indeed, the view point positions in Matsugu are necessary to calculate parameters. See, Matsugu, Abstract; and column 3, lines 36-44, for example. The view point positions are represented by equations (1) and (2) as further disclosed in Matsugu at column 7 in lines 4-5. This clearly contrasts the present invention that enables the calculation of parameters without view point positions by using images at three or more view points as required by claim 1. Therefore, Applicants believe that the subject matter as defined by claim 1 is patentable over the Matsugu reference based on at least these reasons.

Accordingly, Applicants respectfully request that the obviousness rejection of claim 1 be withdrawn.

Applicants note that claims 6-12 have been rendered allowable. Further, claims 2-5 have been objected to as being dependent upon a rejected base claim but would be allowable if rewritten in independent form including all the limitations of the base and any intervening claims. With respect to claims 3 and 5, the Patent Office further asserts that these claims would need to overcome the rejection under 35 U.S.C. § 112, second paragraph.

However, Applicants believe that the rejection under 35 U.S.C. § 112 with respect to claims 3 and 5 was address in Applicants' previously submitted amendment. In this regard, claims 3 and 5 were both amended to depend from claim 2. This was in response to the Patent Offices comments regarding same on pages 2 and 3 of the Office Action dated March 16, 2004. Thus, Applicants believe that the rejection of claims 3 and 5 under 35 U.S.C. § 112 has been addressed and therefore should be withdrawn.

For the foregoing reasons, Applicants respectfully submit that the present application is in condition for allowance and earnestly solicit reconsideration of same.

Respectfully submitted,

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